

September 8, 1982

Mr. Thomas Wright, Chief
Division of Air and Hazardous Materials
Room 204, Health Bldg.
75 Davis St.
Providence, RI 02908

RCRA RECORDS CENTER

FACILITY OLIN HUNT SPECIALTYI.D. NO. RID 095976544FILE LOC. R-1BOTHER closure/post closure plans

Dear Mr. Wright:

Enclosed are documents relating to "closure" of Philip A. Hunt Chem. Corp's Saylesville and Limerock Facilities. These documents include;

1. Stephen Pozner's (Hunt's Environmental Egr.) letter to you reviewing Hunt's intent to "close" the drum storage areas at both plants so that Hunt would no longer be subject to the Hazardous Waste Treatment and Storage Facility permit regulations at the above referenced facilities.
2. Closure plans for each facility - plans which address "closure" of drum storage areas.
3. For the Limerock facility - certificates of closure, a survey map of the drum storage area, and a notice which is to be recorded with the deed (similar documents will be submitted for the Saylesville Facility following the initiation of closure at the Saylesville Plant).

Please note that within the letters and plans it is indicated that a copy of the manifest used to transport drums from the Limerock Facility on August 30, 1982 would be enclosed, it is not. A copy has been submitted to your office separately as is routinely done by Hunt for all shipments. Please refer to manifest number RI 001191

for a complete record of waste transport. If unable to
locate please contact me and I will forward another copy.

Thank-you.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Spirito". The signature is written in a cursive, slightly slanted style.

John Spirito, P.E.
Principal Engineer

September 7th, 1982

Mr. Stephen Pozner
Safety/Environmental Engineer
Philip A. Hunt Chemical Corp.
One Wellington Road
Lincoln, R.I.

Re: Certification of Closure of the
Drum Storage Area at the Limerock
Plant, One Wellington Road,
Lincoln, R.I.

Dear Mr. Pozner:

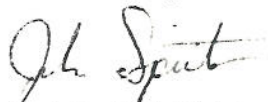
This is to CERTIFY that the Drum Storage Area at your Limerock Facility has been closed in accordance with the Closure plan required for said storage area dated September 1, 1982.

Representatives from this office inspected the drum storage area prior to and following initiation of closure, removal of drums from the site, and have reviewed the manifests used for transport off-site. I am fully satisfied that the drum storage area was properly closed.

Attached please find a Closure survey plan which is to be submitted to the R.I. Dept. of Environmental Management as required by Rule 3.10 of the Treatment and Storage Regulations and the Notice that the area was used to manage hazardous wastes which is to be filed with the deed as required by Rule 3.11 .

Please contact me if you have any questions.

Sincerely,



John Spirito, P.E.
Principal Engineer



PHILIP A. HUNT CHEMICAL CORPORATION
ORGANIC CHEMICAL DIVISION

September 7, 1982

Mr. Thomas E. Wright, Chief
Division of Air and Hazardous Materials
Department of Environmental Management
75 Davis Street
Providence, Rhode Island 02908

Re: Certification of Closure of the Limerock
Plant Drum Storage Area.

Dear Mr. Wright:

I hereby CERTIFY that the drum storage area at our Limerock Plant on One Wellington Rd., Lincoln, R.I. has been completely closed in accordance with the Closure Plan prepared for said storage area by AE & T dated September 1, 1982.

The drums in storage as of August 30, 1981 were transported off-site as the enclosed manifest indicates. There was no spillage or leakage of wastes in the drum storage area requiring decontamination, all concrete surfaces within the diked area are free of any hazardous waste residue. From this date forward all wastes stored in drums shall be transported off-site by a permitted transporter to an approved facility - within 90 days of the waste accumulation start date.

Please contact me if you have any questions concerning this matter.

Sincerely,

Stephen Pozner
Safety/Environmental Engineer

RCRA RECORDS CENTER
FACILITY OLIH HUNT SPECIALTY
I.D. NO. RID 095976544
FILE LOC. R-1B
OTHER _____

HAZARDOUS WASTE DRUM STORAGE

AREA CLOSURE PLAN

PREPARED FOR:

PHILIP A. HUNT CHEMICAL CORP.
LIMEROCK PLANT, LINCOLN

PREPARED BY:

APPLIED ENVIRONMENTAL TECHNOLOGIES CORPORATION
ADMINISTRATION BLDG. 7, RM 240
DAVISVILLE, RHODE ISLAND 02854

SEPTEMBER 1, 1982



1.00 HAZARDOUS WASTE DRUM STORAGE AREA CLOSURE
PLAN AND CLOSURE COST ESTIMATE

Philip A. Hunt Chemical Corp.
Limerock Plant, One Wellington Rd.
Lincoln, R.I.

1.10 INTRODUCTION

1.10.1 GENERAL

The purpose of this plan is to describe how Philip A. Hunt Chemical Corp. will close the hazardous waste drum storage aspects of its facility in a manner that:

Minimizes the need for further maintenance
and Controls, minimizes or eliminates post-
closure escape of hazardous waste.

This plan sets forth all of the steps required to be taken by Philip A. Hunt Chemical Corp. to properly and completely close its hazardous waste drum storage area. These steps include:

- A description of how and when the drum storage area will be partially closed.
- An estimate of the maximum inventory of wastes in drum storage at the initiation of closure.
- A description of the steps needed to decontaminate hazardous waste equipment during closure.
- A schedule for final closure.
- Certification requirements by an independent registered engineer.

Once partial closure of the drum storage area has been executed hazardous waste stored in drums will no longer be stored on-site for periods equal to or greater than 90 days. All hazardous waste stored in drums on-site will be transported off-site to a permitted facility within 90 days of the accumulation start date.

1.20 HAZARDOUS WASTE STORED IN DRUM STORAGE AREA

1.21 DESCRIPTION AND LIST OF WASTES

The Philip A. Hunt Chemical Corp. (Hunt) is a chemical manufacturing company located on Wellington Rd. Lincoln, Rhode Island. Hunt manufactures photographic, electronic, electro-static water treatment, and other fine organic specialty chemicals.

In the process of manufacturing these chemicals some wastes are generated. Some of the wastes are considered as hazardous wastes under both State and Federal Hazardous Waste Regulations.

The attached manifest provides a complete list of wastes which had been in drum storage at the initiation of closure.

1.22 MAXIMUM INVENTORY

The total number of drums transported off-site constitutes the maximum inventory. As indicated above a copy of the manifest used for proper transport of the waste is attached.

1.30 CLOSURE SCHEDULE

The following schedule includes anticipated dates when wastes will no longer be stored at the Limerock Plant for period exceeding 90 days, and intervening closure milestone dates which will allow tracking of the progress of closure.

<u>Event</u>	<u>Anticipated Date</u>
Hazardous Waste no longer stored in drum storage area for periods exceeding 90 days. (Closure initiation date)	August 30, 1982
Final volume of waste	* See note below

Remove all containers of hazardous wastes from site.

* See note below

Decontaminate storage containment areas.

Within 5 days of closure initiation date or within 5 days of approval of closure plan amendment by DEM, if later.

Submit closure certification to DEM by operator and a registered engineer.

Within 10 days of closure initiation date or within 10 days of approval of closure plan amendment by EPA/DEM, if later.

* The Storage area is to remain in use, the only change will be in the duration of storage (less than 90 days).

1.40 REMOVAL OF HAZARDOUS WASTE

As indicated in section 1.22, all wastes in the drum storage area have been transported off-site to a permitted facility on the closure initiation date.

1.50 DECONTAMINATION OF HAZARDOUS WASTE

STORAGE/TREATMENT AREAS

This section of the closure plan will describe how the drum storage area used to store hazardous wastes will be decontaminated.

1.51 CONTAINER STORAGE AREA

Following removal of all drums of hazardous waste and the start of storage under the 90 day limit. The drum storage areas will be inspected for leaks and spills of hazardous waste. Any such leaks or spills will be cleaned up using sand or absorbent. If such clean up were required the contaminated material will be drummed for shipment to a permitted off-site facility. It is not anticipated that such clean up will be required since there is currently no leakage

or spillage of hazardous waste in the area and all wastes are stored in proper drums.

Drummed wastes are currently stored within a bermed concrete containment area which minimizes the possibility of any leakage or spillage of hazardous waste onto the ground.

1.52 PROTECTIVE AND SPILL CLEAN-UP EQUIPMENT

Following the container storage area decontamination, all personnel protective equipment and spill clean-up equipment which have become contaminated during the operations specified in Section 1.40 and 1.50 of this plan, will be containerized and shipped to a permitted off-site facility. Again the need for such is not anticipated.

1.60 FACILITY STATUS DURING CLOSURE

1.61 CERTIFICATION BY OWNER/OPERATOR

When closure is complete, the owner/operator will submit a signed certification (copy attached) to DEM that the facility has been closed in full accordance with the specifications in the approved closure plan.

1.62 CERTIFICATION BY AN ENGINEER

1.62.1 INSPECTIONS DURING CLOSURE

During the facility closure operations specified in Sections 1.40 and 1.50 of this plan, Hunt will obtain the services of an independent registered engineer to oversee said operations. The engineer will inspect the hazardous waste inventory removal operation and the drum storage decontamination operations to insure they are carried out in accordance with the approved closure plan.

1.62.2 CERTIFICATION BY THE ENGINEER

When closure has been completed, the registered engineer indicated in Section 1.62.1 of this plan will submit a written certification (copy attached)

to DEM that the drum storage area has been closed in accordance with the specifications in the approved closure plan.

• 1.70 COST ESTIMATE OF DRUM STORAGE AREA CLOSURE

This section of the closure plan is not necessary since all wastes have been removed from the site as of August 30, 1982.

1.71 AMENDMENT PLAN

If DEM does not approve or requires the plan to be modified, a new or modified plan will be submitted to DEM within 30 days of the date of such notification by DEM.